

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

V.

CR. NO. 05-10113-DPW

REYLANDO RISE

**DEFENDANT'S MEMORANDUM AND PROFFER IN SUPPORT OF PRETRIAL
RELEASE**

Defendant Reylando Rise, by his attorney, submits the following in support of his pretrial release:

This Court should conclude that conditions of pretrial release exist which will both assure his appearance as required and the safety of the community.

Defendant's Grandmother, Josephine Ross, is the owner of a three family residence at 150 Harvard Street, Dorchester, Massachusetts. Ms. Ross, her son Daniel (defendant's father), and the defendant reside on the third floor; other family members reside on the first and second floor. On information and belief, Ms. Ross owns the residence unencumbered by mortgage or other liens. Ms. Ross has offered to grant a mortgage on her property as collateral for an appearance bond for her grandson.

Accordingly, defendant submits that the Court should order his release on the condition of home confinement at 150 Harvard Street, Dorchester, Massachusetts; an appearance bond in a reasonable amount to be secured by a mortgage and deed in escrow for said property; electronic monitoring and other statutory terms and conditions of release.

FILED
In Open Court
USDC, Mass.
Date 5/17/05
By *[Signature]*
Deputy Clerk

REYLANDO RISE
By his attorney,



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May 17, 2005